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7 UNITED STATES DISTRICT COURT FOR THE  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 UNITED STATES OF AMERICA,

11 Plaintiff

12 v.

13 REAL PROPERTY LOCATED AT 14420  
14 TUKWILA INTERNATIONAL  
15 BOULEVARD, TUKWILA, WASHINGTON,  
16 KING COUNTY PARCEL NUMBER  
17 004000-0175,

18 REAL PROPERTY LOCATED AT 14440  
19 TUKWILA INTERNATIONAL  
20 BOULEVARD, TUKWILA, WASHINGTON,  
21 KING COUNTY PARCEL NUMBER  
22 004000-0190,

23 REAL PROPERTY LOCATED AT 3747  
24 146<sup>TH</sup> STREET, TUKWILA,  
25 WASHINGTON, KING COUNTY PARCEL  
26 NUMBER 004000-0911, and

27 REAL PROPERTY LOCATED AT 3754  
28 175<sup>th</sup> STREET, SEATAC, WASHINGTON,  
KING COUNTY PARCEL NUMBER  
538100-0439,

Defendants.

NO.

**NOTICE OF COMPLAINT FOR  
FORFEITURE IN REM**

U.S. v. 14420 TUKWILA INTERNATIONAL BLVD., ET AL.  
NOTICE OF COMPLAINT FOR FORFEITURE *IN REM* - 1

UNITED STATES ATTORNEY  
700 STEWART STREET, SUITE 5220  
SEATTLE, WASHINGTON 98101  
(206) 553-7970

1 N K Saroya, L.L.C.  
2 c/o Kulwinder Saroya, registered service agent  
3 3754 S. 175<sup>th</sup> Street  
4 Seatac, WA 98168

5 Pacific City Bank  
6 SBA Department  
7 3701 Wilshire Blvd., #310  
8 Los Angeles, CA 90010

9 Jaspal & Puar, L.L.C.  
10 c/o Lakhvir Singh  
11 14440 International Blvd.  
12 Tukwila, WA 98168

13 CityBank  
14 Financial Center Branch  
15 P.O. Box 97007  
16 Lynnwood, WA 98046-9707

17 M. Jaspa Company, LLC  
18 c/o Jaspal Singh  
19 3747 S. 146<sup>th</sup> St.  
20 Tukwila, WA 98168

21 Center Bank  
22 Note Center  
23 3435 Wilshire Blvd.,  
24 Los Angeles, CA 9001

25 Whidbey Island Bank  
26 Corporate Headquarters  
27 450 SW Bayshore Drive  
28 Oak Harbor, WA 98277

Kulwinder Saroya,  
a married man, as his own separate estate  
3754 South 175<sup>th</sup> Street  
Seatac, WA 98188

1 Mortgage Electronic Registration System, Inc.  
 2 Nominee for JP Morgan Chase  
 3 P.O. Box 2026 Flint,  
 4 MI 48501-2026

5 JP Morgan Chase Bank, N.A.  
 6 c/o CT Corporation System  
 7 1801 W. Bay Drive NW, Suite 206  
 8 Olympia, WA 98502

9 A civil complaint seeking forfeiture pursuant to the provisions of 21 U.S.C. §  
 10 881(a)(7) for violations of 21 U.S.C. §§ 856(a)(2) (Maintaining a Drug Involved  
 11 Premises) and 841(a)(1) (Distribution of Controlled Substances); pursuant to the  
 12 provisions of 18 U.S.C. 981(a)(1)(A) for violations of 18 U.S.C. §§ 1956(a)(1)(B)(i)  
 13 (Concealment Money Laundering) and 1956(a)(1)(A)(i) (Promotional Money  
 14 Laundering) was filed on August 27, 2013, in the United States District Court for the  
 15 Western District of Washington, by Assistant United States Attorney Richard E. Cohen,  
 16 on behalf of the United States of America, Plaintiff, against the above-captioned  
 17 defendant properties. The complaint alleges that the defendant properties may, for the  
 18 causes stated in the complaint, be forfeited to the United States.

19 In order to avoid forfeiture of the defendant properties, any person claiming an  
 20 interest in the defendant properties must file a statement of interest or right in the manner  
 21 set forth in Rule G(5) of the Supplemental Rules for Admiralty or Maritime Claims and  
 22 Asset Forfeiture Actions, Federal Rules of Civil Procedure, except that such claim must  
 23 be filed not later than 35 days after the date of service of the complaint or, as applicable,  
 24 not later than 30 days after the date of final publication of notice of the filing of the  
 25 complaint. In addition, any person having filed such a claim shall also file an answer to  
 26 the complaint not later than 20 days after the filing of the claim.

27 Supplemental Rule G(5)(a) provides in pertinent part: "(i) A person who asserts an  
 28 interest in the defendant property may contest the forfeiture by filing a claim in the court  
 where the action is pending. The claim must: (A) identify the specific property claimed;

1 (B) identify the claimant and state the claimant's interest in the property; (C) be signed  
2 by the claimant under penalty of perjury; and (D) be served on the government  
3 attorney...." Supplemental Rule G(5)(b) continues: "A claimant must serve and file an  
4 answer to the complaint or a motion under Rule 12 within 20 days after filing the claim."

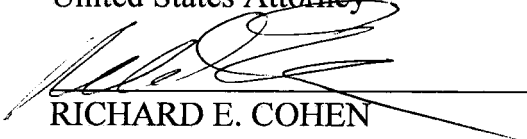
5 Claims should be filed with the Office of the Clerk, United States District Court  
6 for the Western District of Washington, 700 Stewart Street, Lobby Level, Seattle,  
7 Washington 98101, and a copy should be served on the United States Attorney's Office,  
8 Attention: Richard E. Cohen, Asset Forfeiture Unit, 700 Stewart Street, Suite 5220,  
9 Seattle, Washington, 98101-1271.

10 Additional procedures and regulations regarding this forfeiture action are found at  
11 18 U.S.C. § 983.

12 DATED this 26th day of August, 2013.

13 Respectfully submitted,

14  
15 JENNY A. DURKAN  
16 United States Attorney

17   
18 RICHARD E. COHEN  
19 Assistant United States Attorney  
20 700 Stewart Street, Suite 5220  
21 Seattle, WA 98101  
22 Telephone: (206) 553-2242  
23 Fax: (206) 553-6934  
24 Email: Richard.E.Cohen@usdoj.gov

25 *Attorney for Plaintiff United States*  
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